

September 8, 2006

Keith Davis, Treasurer Straight Talk America 211 North Union Street, Suite 200 Alexandria, VA 22314

Response Due Date: October 10, 2006

Identification Number:

C00413245

Reference:

July Monthly Report (6/1/06-6/30/06)

Dear Mr. Davis:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

-Your report discloses a reimbursement(s) for "Travel Reimbursement" to the Dennehy Group and the Eudy Company, apparent corporations. These appear to be in-kind contributions made on behalf of your committee, as the <u>original</u> payment for the goods and services has been made by an entity other than your committee. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, salaries, telephone service, office equipment and supplies.

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), unaffiliated political committee, or any other entity would be considered an in-kind contribution from that person, committee or entity, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 C.F.R. §104.3, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Please clarify the reimbursement(s) for apparent administrative expenses made to the Dennehy Group and the Eudy Company by your committee and provide the date(s) the goods/services were provided.

-Schedule B of your report discloses a reimbursement(s) to an individual(s) for apparent travel and subsistence advances in which the